

REMARKS/ARGUMENTS

This letter is responsive to the office action dated January 10, 2008. A certified copy of the priority application is being filed herewith.

In the office action, the Examiner rejected claims 1 to 46 under 35 U.S.C. 103(a) as being obvious in view of U.S. Patent No. 7,216,072 in the name of Kasai et al. ("Kasai") and U.S. Pub. No. 2003/0105873 A1 in the name of Ye et al. ("Ye"). The Applicants respectfully traverse all rejections.

Claims 2-4, 15-22, 24-26, and 37-44 are hereby canceled without prejudice. Claims 1, 5-14, 23, 27-36, and 45-46 remain in this application.

To expedite prosecution of the application, the Applicants have amended independent claims 1, 23, and 45, directed to particular embodiments taught by the Applicants in the present application. Support for the amendments may be found in the description at, for example, paragraphs [0018] to [0023] and claims 2, 3, 15, 22, 23 and 37 as filed. No new matter is added. The Applicants reserve the right to address some or all of the objections raised by the Examiner in the present office action in the prosecution of a continuation application.

The independent claims have been amended to clarify that the at least one server comprises a proxy and a processing server. Furthermore, the amended independent claims require that the representation of the initial message is sent first to the proxy for conversion from a text format into a new format compatible with a processing server before sending the initial message in the new format to the processing server, and then to the processing server, the new format being hypertext markup language.

Put another way, the amended independent claims require that the proxy server first convert message text into hypertext markup language (HTML) format before the formatted message is sent to the processing server for further processing (e.g. for translation). Accordingly, a two-step process is performed. First, there is a conversion of text received from a mobile device to HTML by a proxy, and then processing of the HTML to input (e.g. translation) by a processing server. This is not disclosed in Kasai.

None of the servers that may be considered to be a "proxy" in Kasai perform a conversion from text, sent from a mobile computer device, into HTML format before the processing server (e.g. a translation server) further processes the message (e.g. performs the translation). The various "proxy servers" disclosed in Kasai perform different functions and work in a different way as compared to the Applicants' claimed proxy. For example, Kasai's proxy server 9 relays web page requests and web page downloads between a WWW browser 7 and a browser 6 on a client device 5 (see e.g. Kasai, col. 5 lines 22-31). As a further example, Kasai's proxy server 2a functions as a translated text cache server, to search for translation results retained in a cache (see e.g. Kasai, col. 8 lines 27-36). None of Kasai's proxy servers are configured to perform the same acts as required by the proxy recited in the Applicants' amended independent claims.

Furthermore, reference to the use of HTML in Kasai is not directed to the same feature of the proxy configured to convert message text to HTML in the Applicants' claimed system. For example, at col. 6 lines 2-9 of Kasai, it is clear that it is a response (i.e. what is generated by the WWW server) is in HTML. However, in obtaining a translation, Kasai does not disclose that the WWW server or any other server performs an intermediate act of converting text received from a mobile device into HTML for use as input to a translation server.

Accordingly, the subject matter of the amended independent claims is novel over Kasai.

It would also be erroneous to suggest that the subject matter of the amended independent claims is obvious over Kasai, either taken alone or in combination with Ye. By separating the HTML conversion functionality with the further processing (e.g. translation) functionality on different servers, existing HTML processing servers (e.g. Internet translators) may be employed to translate text identified at a mobile device. This may result in reduced implementation costs. For example, there might be cost savings in implementing a flexible system that may "piggyback" on existing (e.g. free) HTML processing servers available on the Internet.

Furthermore, in the embodiments described in Kasai where the WWW server is already configured to generate HTML data, there would be no need for a proxy to convert text to HTML in order that the translation server can perform the translation. For example, in the "first embodiment" of Kasai, what is being translated is a homepage, which is already described in HTML or in some other similar non-text format (see e.g. col. 11 lines 61-67). It is respectfully submitted that this teaches away from the subject matter of the Applicants' independent claims.

In Kasai, at column 26 lines 5-16, there is a suggestion that an existing translation service may be utilized. However, Kasai teaches a solution where text is transmitted (by e-mail) directly to a translation server, by a server device 8 for example. Kasai does not suggest the use of an intervening proxy server to convert text received from a mobile computer device into HTML first, before the HTML-formatted text is sent to the translation server for further processing. It is submitted that Kasai teaches that the translation server needs to be specifically customized to accept text in e-mails (e.g. to be received at a predetermined

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address as noted at lines 8-9) as input for translation. This does not address the problem of how an existing translation service that only accepts HTML input might be used. Accordingly, this particular solution taught by Kasai also teaches away from the subject matter of the Applicants' amended independent claims.

Accordingly, the Applicants submit that the subject matter of amended independent claims 1, 23, and 45, is both new and not obvious in view of Kasai, taken alone or in combination with Ye, and that the subject matter of the remaining claims that are dependent on the amended independent claims is also new and not obvious for the same reasons.

For at least the foregoing reasons, it is submitted that each of claims 1, 5-14, 23, 27-36, and 45-46 is now in form for allowance, and a notice to that effect is respectfully requested. Should there be any remaining issues after this amendment, the Examiner is kindly invited to call the undersigned.

Yours truly,

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